

**THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

CORNEL WEST AND MELINA
ABDULLAH, GERALDINE
TUNSTALLE, KATHERINE HOPKINS-
BOT, AND CHARLES HIER,

Plaintiffs,

V.

PENNSYLVANIA DEPARTMENT OF
STATE AND AL SCHMIDT, IN HIS
CAPACITY AS SECRETARY OF THE
COMMONWEALTH,

Defendants.

No. 2:24-cv-01349

(filed electronically)

MOTION FOR WITHDRAWAL OF APPEARANCE AS COUNSEL *PRO HAC*
VICE

Samantha G. Zimmer hereby moves for withdrawal of appearance as counsel *pro hac vice* for Plaintiffs in the above-captioned matter pursuant to LCvR 83.2 C.4, for the reasons set forth below:

1. Plaintiffs commenced this action on September 25, 2024, and were represented by attorneys at both Kleinbard LLC and McNeese Wallace and Nurick LLC at that time.

2. On January 22, 2025, the undersigned filed a Motion for Admission *Pro Hac Vice* in this matter on behalf of Plaintiffs Cornel West, Melina Abdullah, Geraldine Tunstalle, Katherine Hopkins-Bot, and Charles Hier. (ECF No. 52).

3. This Court granted the Motion for Admission *Pro Hac Vice* on January 23, 2025. (ECF No. 53).

4. Since then, co-counsel for this matter, Shohin H. Vance, left employment with Kleinbard LLC and will continue representation for Plaintiffs in this matter with a new law firm.

5. Because Kleinbard LLC is no longer representing Plaintiffs, the undersigned moves for withdrawal of appearance.

6. In accordance with LCvR 83.2 C.4. the attorney succeeding representation is:

Shohin H. Vance
Saxton & Stump
100 Deerfield Lane, Suite 240
Malvern, PA 19355
Ph: (484) 328-8512

WHEREFORE, the undersigned counsel respectfully requests that this Court grant the Motion and enter the attached proposed order for withdrawal of admission as counsel *pro hac vice*.

Respectfully submitted,

Dated: 6/9/2025

/s/ Samantha G. Zimmer
Samantha G. Zimmer (No. 325650)
KLEINBARD LLC
1717 Arch Street, 5th Floor
Philadelphia, PA 19103
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Attorney for Plaintiffs

CERTIFICATE OF SERVICE

I, Samantha G. Zimmer, certify that on June 9, 2025, a true and correct copy of the Motion for Withdrawal of Appearance as Counsel *Pro Hac Vice* was filed electronically and is available for viewing and downloading from the ECF system.

/s/ Samantha G. Zimmer
Samantha G. Zimmer